



**Environmental  
Operations, Inc.**  
CLEARING THE WAY

April 9, 2018

Mr. Bruce Morrison  
Project Manager  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

RE: Progress Report  
Solutia – John F. Queeny Plant  
St. Louis, Missouri  
**EPA ID No. MOD 004 954 111**

RCRA 4/9/2018



Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009.

Reporting Period

February 1, 2018 – March 31.2018

Description of the work conducted pursuant to the Order during the reporting period.

- EOI had multiple communications with EPA pertaining to the development of the Environmental Covenant.
- EPA sent a comment letter dated February 27, 2018 on the Vapor Intrusion Work Plan Implementation Report
- EPA sent a letter dated February 28, 2018 to Mr. Ted Ahrens regarding monitoring of the building with recommendations for possible future approaches to vapor intrusion concerns.
- EOI provided electronic version of reports to Mr. Ahrens and suggested meeting to answer any questions.
- EOI conducted the semi-annual groundwater monitoring March 19-21, 2018.

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Mr. Bruce Morrison  
April 5, 2018

- EOI submitted the revised Vapor Intrusion Work Plan Implementation Report dated March 27, 2018 to EPA.
- EOI received the Environmental Covenant on March 28, 2018 for signature and return to EPA.

Estimate of the percentage of the project completed during the reporting period

- Not applicable (NA).

Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- NA.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

- NA

Description of the status of property transfer(s) during the reporting period.

- No change since last update.

Description of the projects and actions which are scheduled for the following reporting period.

- Meet with Mr. Ahrens to discuss vapor intrusion testing results
- Perform QA/QC on groundwater data results.
- Sign/notarize and return Environmental Covenant to EPA. File fully executed document with the City of St. Louis and provide a date-stamped copy to EPA.

If there are questions or concerns related to this Progress Report, please contact Larry Rosen, who can be reached by phone at (314) 480-4694, or via email at [larryr@environmentalops.com](mailto:larryr@environmentalops.com).

Respectfully submitted,  
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.  
Senior Project Manager

Copy: Mr. Michael House/Solutia  
Ms. Christine Kump-Mitchell/MDNR  
Mr. Rich Nussbaum/ MDNR